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17 *Attorneys for Defendant Bristol-Myers Squibb Company*

18 [Additional Counsel Listed At Signature Page]

19 UNITED STATES DISTRICT COURT  
20 NORTHERN DISTRICT OF CALIFORNIA  
21 SAN FRANCISCO DIVISION

22 JENNIE CADDELL *et al.*,

No. 14-3482 RS

23 Plaintiff,

24 v.

25 **JOINT STIPULATION AND**  
26 **~~[PROPOSED]~~ ORDER TO STAY**  
27 **LITIGATION PENDING TRANSFER TO**  
28 **THE PLAVIX® MDL**

29 BRISTOL-MYERS SQUIBB COMPANY,  
30 MCKESSON CORPORATION, and  
31 DOES 1 to 100,

32 Defendants.

Judge: Hon. Richard Seeborg

1 This Joint Stipulation is made by and between Plaintiffs in *Caddell et al. v. Bristol-Myers*  
2 *Squibb Co. et al.*, No. CV-14-3482 RS (N.D. Cal.), and Defendant Bristol-Myers Squibb Company  
3 (“BMS”) (collectively “the Parties”), by and through the undersigned counsel of record, with  
4 reference to the following facts:

5 1. WHEREAS, on February 12, 2013, the Judicial Panel on Multidistrict Litigation  
6 (“JPML”) established a multidistrict Plavix® litigation in the District of New Jersey, assigned to  
7 Judge Freda Wolfson;

8 2. WHEREAS, on July 31, 2014, Plaintiffs filed the *Caddell* action in the Superior  
9 Court of California, San Francisco County;

10 3. WHEREAS, on August 1, 2014, the *Caddell* action was removed to this Court by  
11 Defendant BMS;

12 4. WHEREAS, on August 12, 2014, Defendant BMS tagged this case for transfer to the  
13 Plavix® MDL and anticipates that the JPML will issue a conditional transfer order for this case  
14 soon; and

15 5. WHEREAS, the parties agree that the *Caddell* action should be stayed pending its  
16 anticipated transfer to the Plavix® MDL in the District of New Jersey.

17  
18 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court’s  
19 approval, that the *Caddell* action should be stayed pending its anticipated transfer to the Plavix®  
20 MDL in the District of New Jersey.

21  
22 **IT IS SO STIPULATED.**  
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1  
2 Dated: August 15, 2014

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9 By: /s/ Joshua C. Ezrin  
Joshua C. Ezrin

10 *Attorney for Plaintiffs*

11  
12 Dated: August 15, 2014

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15 By: /s/ Sharon D. Mayo  
Sharon D. Mayo

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17 *Attorney for Defendant*  
18 *Bristol-Myers Squibb Company*

19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**  
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21  
22 Date: 8/18/14

23   
Judge Richard Seeborg  
U.S. District Judge